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PAUL E. SULLIVAN, CA & DC.

August 13, 2015

Federal Election Commission
Office of Complaints Examination
And Legal Administration
Att: Kim Collins, Paralegal
999 E Street NW
Washington, D.C. 20436

RECEIVED
FEDERAL ELECTION
COMMISSION
2015 AUG 13 PM 1:15
CELA

RE: MUR 6947
Designation of Counsel

Emailed to kcollins@fec.gov; original by USPS

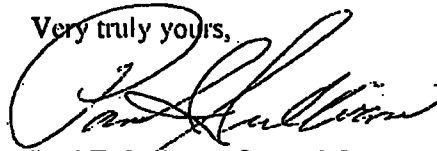
Dear Ms. Collins:

Enclosed please find executed Designation of Counsel forms for Carson America, Inc., Logan D. Delany, Jr. Treasurer and Doug Watts related to the above referenced matter.

For that reason, I would request
an extension of time to August 21, 2015 to file a response in the above referenced matter.

Should you have any questions, please contact me directly.

Very truly yours,



Paul E. Sullivan, General Counsel
Carson America, Inc.

DECLARATION OF DOUG WATTS
BEFORE THE FEDERAL ELECTION COMMISSION

MUR 6945

FEDERAL ELECTION
COMMISSION

2015 AUG 13 PM 1:15

CELA

I, Doug Watts, being of majority declare, under penalty of perjury, the following:

1. I am Doug Watts, the undersigned and am a resident of the State of Connecticut. I have personal knowledge of the facts set out herein.
2. Currently and at all times related to the facts set out herein, I served as Director of Communications for Carson America, Inc., the principle campaign committee for Dr. Benjamin S. Carson, Sr. (Committee).
3. On or about June 3 or 4, 2015, I received a telephone call and several follow-up calls from Robert Costa (Costa) and Phillip Rucker (Rucker) each of whom identified themselves as reporters from the Washington Post. I recall that I spoke with Costa twice and Rucker once. They inquired as to whether they could interview me regarding various aspects of the Committee's activities and I agreed. My comments were in response to specific questions that they presented to me.
4. Though Rucker and Costa inquired about a number of matters related to the Committee, as to matters related to this MUR, the scope of questions posed by Costa and Rucker revolved around them attempting to have me generically explain the generic operation of independent expenditure only committees (IEOC), which they referred to as "Super PACs". The product of the interview was an article published in the Washington Post on June 5, 2015 a true and complete copy of which is attached hereto at Exhibit A (Article).
5. The Article states in part, "Still, Watts said that the 'unofficially sanctioned' super PAC (sic) is One Vote and that Carson invites supporters to 'make their excess contributions' to that group." (Article, page 2).
6. Both Rucker and Costa raised questions related to an IEOC entitled "Run Ben Run" (RBR) and how it operates, the internal "chaos" within the organization and its interaction with the Committee. I responded by indicating that I did not know about the operations of RBR and that to get a response to the question Rucker and Costa would have to contact those persons operating RBR.

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7. Rucker and Costa, raised questions related to both RBR and "One Vote" (OV) another IEOC, as examples of how an IEOC must operate independent of a candidate's campaign. They continued questions as to how an IEOC operates related to candidate committees.
8. I used OV as an example to explain the fact that those contributors who have made the maximum contribution to a candidate's campaign, turn to an IEOC as a means to make contributions to an entity that publicly support a specific candidate and which is lawfully eligible to accept contributions in excess of the limits the FECA places upon contributors to candidate's principle campaign committees, such as CAI.
9. At no time during the interview or subsequently to the interview did I state to either Costa or Rucker that OV was the "unofficially sanctioned" "super PAC of CAI. When asked by them which were the approved IEOC of CAI, I told them there was no "official" or "sanctioned" IEOC of CAI. The references to OV and RBR were referenced as examples of how an IEOC operates and not in conjunction with CAI.
10. Similarly, at no time during the interview or subsequently to the interview did I state that Carson "invites supporters to 'make excessive contributions' to that group." My only comment on this issue was that an IEOC often times solicit those persons who have already made the maximum contribution to a candidate to provide them an additional opportunity to make a contribution that will support a candidate. Note, that in the article, the reference to "Carson invites" is not in quotation but only the generic reference to "make their excess contributions" to that group." Except for my specific denials that there was no "sanctioned" IEOC of CAI, my comments at all times were of a generic nature, albeit, using RBR and OV as examples in an attempt to respond to the general questions about the operations of an IEOC.

I declare that, to the best of my knowledge, the foregoing is true and correct.

Doug Watts

1800 222 2222

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Phone: (202) 434-8263 Email: paul@psullivanlaw.com

Signature

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, D.C. 20463

Statement of Designation of Counsel

Doug Watts

MUR 6974

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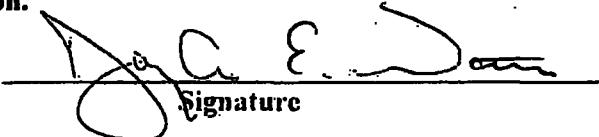
Name of Counsel: Paul E. Sullivan

Firm: Sullivan & Associates, PLLC
Attorneys-at-Law
601 Pennsylvania Ave. N.W.
Suite 900
Washington, D.C. 20004

Phone: (202) 434-8263 **Email:** paul@psullivanlaw.com

The above named individual is hereby designated as my counsel and is authorized to receive any notification and other communications from the Commission and to act on my behalf before the Commission.

August 13, 2015
Date


Signature

Name (Print): Doug Watts
Address: 1800 Diagonal Road, Suite 140
Alexandria, VA 22314

Telephone: Home: () _____
Business: () _____

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